

The Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

TRACY AYNES,

Plaintiff,

v.

KELLOGG SALES COMPANY,

Defendants.

Case No. C07-05623 RBL

**VOIR DIRE QUESTIONS  
PROPOUNDED BY DEFENDANT,  
KELLOGG SALES COMPANY**

Pursuant to the Court's pretrial order, Defendant, Kellogg Sales Company, submits the following proposed jury voir dire:

1. Have you ever been dismissed from a job for performance reasons?
2. Have you ever had a bad performance review that you felt was undeserved?
3. Have you ever worked with anyone who you found difficult?
4. Do you think it is fair to evaluate employees on the way they communicate with others?  
Is it fair to evaluate them on how they get along with one another?
5. Does anyone believe, even to a degree, that the fact this case is being brought to trial means there must be merit to Plaintiff's claims?
6. Have you ever been dissatisfied by a Kellogg product?
7. Do you believe there is a Good Ole Boys Club?

**VOIR DIRE QUESTIONS PROPOUNDED BY DEF.**

FIRMWIDE:88288761.1 047719.1009

Case No. C07-05623 RBL

-1-

LITTLER MENDELSON, P.C.  
One Union Square  
600 University, Ste 3200  
Seattle, WA 98101.3122  
206.623.3300

- 1 8. Have you ever been furloughed or laid off from a job?  
2 Were you offered severance?  
3 9. If you were laid off, did you find another job? How long did that take?  
4 10. Have you ever made a complaint of discrimination?  
5 11. Have you ever believed you were discriminated against but did not make a complaint?  
6 12. Have you ever been a party to a lawsuit?  
7 If you were a party to a lawsuit, did you feel that you received a fair result?  
8 Did you feel that you were able to communicate your side of the dispute?  
9

10 DATED: January 27, 2009  
11

/s/ Leigh Ann Tift

Leigh Ann Tift, WSBA #11776

ltift@littler.com

LITTLER MENDELSON PC

One Union Square

600 University, Ste 3200

Seattle, WA 98101.3122

Phone: 206.623.3300

Fax: 206.447.6965

Attorneys for Defendant

KELLOGG SALES COMPANY

26 VOIR DIRE QUESTIONS PROPOUNDED BY DEF.

FIRMWIDE:88288761.1 047719.1009

Case No. C07-05623 RBL

-2-

LITTLER MENDELSON, P.C.  
One Union Square  
600 University, Ste 3200  
Seattle, WA 98101.3122  
206.623.3300

**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2009 I caused the following document to be electronically filed with the Clerk of the Court using the CM/ECF system:

**VOIR DIRE QUESTIONS PROPOUNDED  
BY DEFENDANT, KELLOGG SALES COMPANY**

which will send notification of such filing to the following:

Anne-Marie E. Sargent  
Email: [aes@consarlaw.com](mailto:aes@consarlaw.com)  
Stephen P. Connor  
Email: [info@consarlaw.com](mailto:info@consarlaw.com)  
CONNOR & SARGENT PLLC  
1200 Fifth Avenue, Suite 1650  
Seattle, WA 98101-3127

Dated: January 27, 2009

/s/ Savanna L. Stevens

Savanna L. Stevens

**VOIR DIRE QUESTIONS PROPOUNDED BY DEF.**

FIRMWIDE:88288761.1 047719.1009

Case No. C07-05623 RBL

-3-

LITTLER MENDELSON, P.C.  
One Union Square  
600 University, Ste 3200  
Seattle, WA 98101.3122  
206.623.3300